

REMARKS

Claims 23-96 are pending in the application.

Claims 23-96 stand rejected.

Claims 99 has been added.

Rejection of Claims under 35 U.S.C. §102

Claims 23-96 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,216 to Ankireddipally, *et al.*, (*Ankireddipally*). Claims 23-96 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,064,987 to Ankireddipally, *et al.*, (*Ankireddipally*). While not conceding that the cited reference qualifies as prior art, but instead to expedite prosecution, Applicants have chosen to respectfully disagree and traverse the rejection as follows. Applicants reserve the right, for example, in a continuing application, to establish that the cited reference, or other references cited now or hereafter, do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

Applicants respectfully traverse each of these rejections. As will be appreciated, “[a] ... claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegall Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully submit that this burden has not been met by the instant Final Office Action, because, as will be shown below, independent Claim 23 recites at least one limitation that is not disclosed, either directly or under the principles of inherency, in *Ankireddipally*. Claim 23 recites:

A method of inter-module communication comprising:
forming a message, wherein

said forming comprises
 inserting customer relations management system information and other
 customer relations management system information into said
 message, and
 configuring said message to be pushed from a customer relations
 management system by encoding at least a portion of said message
 in a markup language,
said customer relations management system information comprises at least one of
 agent information and work item information,
said agent information comprises information regarding an agent,
said work item information comprises information regarding a work item,
said other customer relations management system information is other than said
 agent information and said work item information, and
said other customer relations management system information comprises at least
 one of a command, a request and a notification.

See Claim 23. Independent Claims 37, 46, 55, 65, 73, 81 and 89 recite materially similar limitations.

Applicants respectfully that elements are recited in Claim 23, and similarly in Claims 37, 46, 55, 65, 73, 81 and 89, which *Ankireddipally* fails to teach. For example, the Final Office Action asserts that *Ankireddipally* discloses “inserting customer relations management system information and other customer relations management system information into said message”. Specifically, the Final Office Action asserts that “forming a message” is taught in the background of *Ankireddipally* at Col. 5, lines 2-5. The cited text teaches “A RosettaNet Object (properly configured PIP) may be directly encapsulated into an HTTP message, into an HTML form, or into a CGI name-value pair.” See *Ankireddipally* at Col. 5, lines 2-5. Applicants respectfully submit that this text does not teach or disclose forming a message. The Final Office Action then asserts that *Ankireddipally* discloses “inserting customer relations management system information ... into said message” in its summary at Col. 7, lines 1-17 and Col 6, lines 41-46. The first cited text teaches,

CXIP protocol specifies the message types that are exchanged between applications, the semantics of these messages, and the exchange order. The application interaction protocol, which is not specific to any particular functional domain and specifies interactions that are independent of transactional content, includes four component parts: message formats, message types, message exchange semantics and transportation assumptions. In an illustrated implementation of the application interaction protocol, data, object and method invocation requests are exchanged between applications by means of structured documents that use XML tags and that are consistent with the protocol. Messages using XML are machine-readable and can be interpreted in a domain-specific fashion. The exchange of self-descriptive XML messages facilitates document life cycle tracking, which is essential in cross-company commerce activity to support auditing and related activities.

See Ankireddipally at Col. 7, lines 1-17. The Final Office Action further asserts that this same text teaches “inserting ... other customer relations management system information into said message”. Applicants respectfully submit that the cited text does not teach the presence of customer relationship management system data, much less the insertion of that data into the message allegedly taught in the summary of *Ankireddipally*. The second cited text teaches,

The present invention is premised on the observation that there are at least two basic constituent parts in any e-commerce business model. These are commerce services, such as shopping carts, catalogs, and payment services, and commerce processes, such as catalog updates, purchase order submissions, bids and quotes.

See Ankireddipally at Col. 6, lines 41-46. Applicants respectfully submit that the cited text does not teach the presence of customer relationship management system data, much less the insertion of that data into the message allegedly taught in the summary of *Ankireddipally*. Even if the cited reference teaches each of the *noun* elements for which it is cited (*e.g.*, other customer relations management system information), which Applicants respectfully do not concede, the Final Office Action cites no teaching of the articulation between elements. The cited sections of *Ankireddipally* do not teach

inserting information into a message whose formation is allegedly taught by *Ankireddipally* in its background.

Applicants respectfully note that “All words in a claim must be considered in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 165 U.S.P.Q. 494, 496 (CCPA 1970). By choosing to jump across the reference for the alleged teachings of various recited elements of the claim and neglecting to explain any teaching of articulation between the separate concepts, the Final Office Action effectively disregards the use of the verb “comprises” in Applicants’ claim limitation. Applicants’ amended Claim 23 recites a “said forming comprises inserting” but the mapping of elements offered by the Final Office Action neglects the recited element (*i.e.* the step of inserting) by ignoring the recited relationship between the part and the whole. For at least this reason, the Final Office Action does not, by pointing to a teaching of each and every element as set forth in the claim allege a *prima facie* case of anticipation of amended Claim 23 by *Ankireddipally*.

Further, Applicants’ amended Claim 23 also recites “configuring said message to be pushed from a customer relations management system by encoding at least a portion of said message in a markup language”, “said other customer relations management system information is other than said agent information and said work item information” and “said other customer relations management system information comprises at least one of a command, a request and a notification”. The Final Office Action asserts that *Ankireddipally* teaches all three of these elements in the above cited text of Col. 7, lines 1-17. Applicants respectfully submit that this assertion the single paragraph, which is

quoted for diverse elements, does not teach all of them. Applicants respectfully more specific guidance in response to the current Request For Continued Examination.

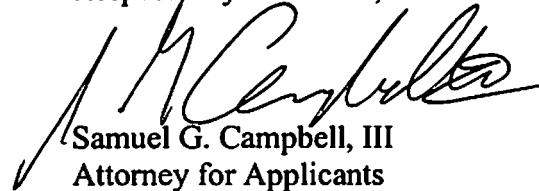
Applicants respectfully submit, therefore, that independent claim 23 is allowable over *Ankireddipally* and Applicants thus respectfully urge the Examiner withdraw the §102 rejection of claim 23. Applicants further respectfully submit that similar Claims 37, 46, 55, 65, 73, 81 and 89 are similarly patentable, and that dependent claims 24-36, 38-45, 47-54, 56-64, 66-72, 74-80, 82-88, 90-96 and new dependent Claim 99 are allowable as depending upon allowable base claims in addition to being allowable for various other reasons

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. G. Campbell, III', is written over the typed name.

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